

Lamb

Communication Services

Filed Electronically Via ECFS February 9, 2006 EB DOCKET NO. 06-36

February 9, 2006

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Reference: EB-06-TC-060, Certification of CPNI Filing of WestCom LLC dba

WesTelFiber

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of WestCom LLC dba WesTelFiber ("WTF") (499 Filer ID (822688) in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006. The Enforcement Bureau has requested the compliance certificate as required by section 64.2009(e) of the Commission's rules.

Unfortunately, we were unable to file by February 6th as required.

Please contact me with any questions or concerns.

Sincerely,

Susan Lamb

Lamb Communication Services

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cc: Byron McCoy, <u>byron.mccoy@fcc.gov</u>

Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

WestCom LLC dba WesTelFiber CPNI Certification and Statement

Before the Federal Communications Commission Washington, D.C. 20554

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-36
As Required by FCC Enforcement)	WestCom LLC dba WesTelFiber
Bureau, DA 06-223)	499 Filer ID 822688

WestCom LLC dba WesTelFiber CERTIFICATION OF CPNI FILING (February 7, 2006)

- 1. WestCom LLC dba WesTelFiber ("WTF") (499 Filer ID 822688) is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), pursuant to section 64.2009(e) of the Federal Communication Commission's rules.
- 2. I am the Managing Member, for WTF. I make this certification from my personal knowledge of the CPNI procedures and policies of WTF.
- 3. WTF does not use CPNI for general marketing purposes at this time. In those few situations where we do a specific marketing campaign which includes testimonials from customers, each customer is contacted and permission is received for that specific marketing promotion. In the event that we decide to use CPNI for general marketing purposes, we will notify our customers under the "opt-out" provisions of the rules. When WTF decides to use CPNI for general marketing purposes it will be done in strict compliance with the principles and requirements outlined in 47 CFR §64 Subpart U of the Commission's rules.
- 4. On behalf of WTF, I certify that, pursuant to the Commission's rules, WTF has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.

Robert R Bass Managing Member

WestCom LLC dba WesTelFiber CPNI Certification and Statement

Before the Federal Communications Commission Washington, D.C. 20554

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-36
As Required by FCC Enforcement)	WestCom LLC dba WesTelFiber
Bureau, DA 06-223)	499 Filer ID 821850

WESTCOM LLC DBA WESTELFIBER CERTIFICATION OF CPNI FILING (February 9, 2006)

OPERATING PROCEDURES STATEMENT

- 1. It is WTF's policy and practice that <u>all</u> customer CPNI information is private and protected unless the authorized customer contact of record specifically requests to "opt-in" to CPNI usage and allow it to be made available to specific vendors or parties in writing and provides a Letter of Authorization ("LOA") to confirm their request. WTF considers that all of the customer's have "opted-out" of CPNI usage unless the customer specifically requests to "opt-in" and allow CPNI usage.
- 2. Customer accounts are prominently noted with the authorized customer contact details and LOA on file indication so that WTF Sales and Customer Care Representatives can readily identify customers opting to <u>not</u> restrict use of their CPNI. When calls are received by WTF Sales and Customer Care from customers with this preferred treatment they verify that they are speaking with the authorized customer party. If they receive a call from a vendor on the customer's behalf they immediately determine the vendors name and number and review the account for a LOA. In the event there is any discrepancy between the vendor's information and the LOA the authorized customer contact is called and a return call is made to the vendor.
- 3. Customers are informed at install that their personal information is safeguarded and will not be used by WTF or given out to anyone other than the authorized party unless the customer's authorized party of record informs WTF they wish to "opt-in" to CPNI usage at which time WTF would request a LOA from the customer. Additionally, customers may "opt-in" or "opt-out" at any time.
- 4. Notice regarding customer CPNI rights and WTF's duty to protect CPNI is provided to all customers in the form of a notice printed one a year on the customer's billing statement.
- 5. WTF employees are trained on the proper use and/or disclosure of CPNI a minimum of once/year.

WestCom LLC dba WesTelFiber CPNI Certification and Statement

- 6. Access to CPNI data is limited to employees with a need to know in order to do their jobs and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.
- 7. WTF management reviews all marketing campaigns and materials and are key to contacting targeted customers for their permission to be included in a specific marketing campaign. These campaigns generally take the form of testimonials. As of this time WTF has not used CPNI data in any general marketing campaigns or materials but the proper safeguards are in place should customer CPNI be used for this purpose.
- 8. An employees improper use or disclosure of CPNI is subject WTF's disciplinary policies and is reviewed a minimum of once per year.